

# Zoë Dolan

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May 19, 2016

Hon. William F. Kuntz II  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States v. Bumagin*, 11 Cr. 800

Dear Judge Kuntz:

As the Court is aware, I represent Semyon Bumagin in the above referenced matter. Attached as Exhibit A is the dismissal agreement executed by the parties, and attached as Exhibit B is the Second Circuit Order dismissing the most recent interlocutory appeal. The defense requests that the dismissal order previously submitted to the Court be entered at this time, and, having further considered the matter, I am not aware of any legal basis for delay.

With regard to re-entry, I am in contact with the client's son, and it is my renewed hope that someone from the family or a family friend can pick up Mr. Bumagin from the courthouse upon his release. In light of the client's dementia, I believe that, in the event someone is not available, he should be afforded the option of an emergency visit to a hospital. Kings County Hospital apparently has a nursing unit, and I understand that Bellevue Hospital may offer shelter services. I request that the United States Marshals call me at (347) 301-5180 if I can be of any assistance in facilitating this transition.

The Court's consideration of this letter is appreciated.

Sincerely,

s/  
Zoë Dolan

Cc: United States Marshals Service, EDNY  
All counsel via ECF